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March 25, 2014

Ms. Rebecca Chu and Mr. Ravi Sanga
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

RE: MODIFICATION OF JORGENSEN FORGE EARLY ACTION AREA REMOVAL ACTION AND JORGENSEN FORGE OUTFALL SITE REMOVAL ACTION BOUNDARIES

Dear Ms. Chu and Mr. Sanga:

The Boeing Company (Boeing), Jorgensen Forge Corporation (Jorgensen Forge), and Earle M. Jorgensen Company (EMJ) (herein referred to as the Parties) are requesting formal approval from the U.S. Environmental Protection Agency (EPA) of a modification to the Parties' respective cleanup boundaries proposed in this letter. Jorgensen Forge and Boeing intend to implement a removal action at the Jorgensen Forge Outfall Site (JFOS) under a pending Third Modification to the Administrative Order on Consent for Removal Action (AOC) (CERCLA Docket No. 10-2011-0017). The boundary for the JFOS Removal Action (Attachment 1) was originally identified in the Second Modification to the AOC between EPA, Boeing, and Jorgensen Forge.

EMJ is implementing a removal action directly adjacent to the JFOS at the Jorgensen Forge Early Action Area (EAA) under a separate AOC with EPA (CERCLA Docket No. No.10-2013-0032). The Jorgensen Forge EAA Removal Action Boundary (RAB; Attachment 2) was originally identified in the EPA-approved *Final Engineering Evaluation/Cost Analysis* dated October 2011.

The Second Modification to the AOC required Boeing and JFC to perform additional subsurface sampling and install a rigid containment barrier generally located in and around the northwestern corner of the Jorgensen Forge property. In accordance with these requirements, Boeing and JFC collected additional angled Geoprobe data below the shoreline bank underlying the northwest corner of the Jorgensen Forge EAA RAB; this area is referred to as the "JFOS-Impacted Material Area." The additional angled Geoprobe data identified elevated polychlorinated biphenyls (PCBs) in soils at depth in the JFOS-Impacted Material Area. Boeing and JFC evaluated the

design and installation of an upland and in-water rigid containment barrier (coffer dam) positioned to contain the soils with elevated PCB concentrations and facilitate coordination of the respective Jorgensen Forge EAA Removal Action and the JFOS Removal Action.

The Parties agreed during a coordination meeting with EPA on January 21, 2014 that the coffer dam alignment would require a slight modification to the shared boundary between the Jorgensen Forge EAA Removal Action and JFOS Removal Action due to concerns about constructability and construction worker health and safety. Following the meeting, EPA indicated it would approve the proposed boundary modification in response to the request and modification details submitted by the Parties in writing. This letter is intended to serve that purpose.

EPA is requiring EMJ to remove the elevated PCB concentrations in the JFOS-Impacted Material Area pursuant to the Jorgensen Forge EAA Removal Action AOC. To that end, EMJ developed a revised, deeper dredge prism in the JFOS-Impacted Material Area. EPA provided written approval on January 23, 2014 for Jorgensen Forge and Boeing to design and construct the coffer dam alignment surrounding the full extents of EMJ's revised dredge prism. As shown on Figure 1, the coffer dam top-of-bank segment extends approximately 8 feet south (upriver) of the southern boundary of the JFOS Removal Action boundary as was depicted in the JFOS Order Second Modification Figure. Figure 1 also shows that this 8-foot upriver extension results in an irregularly shaped corner in the Jorgensen Forge EAA RAB (see tan triangle).

As described in the EPA-approved Jorgensen Forge EAA Removal Action Basis of Design Report dated August 2013, EMJ is required to perform bank excavation and subsequent placement of shoreline containment materials in the irregularly shaped corner. As discussed with EPA during the meeting on January 21, 2014, the Parties have constructability and construction work health and safety concerns associated with attempting to perform the required work in this corner as part of the EMJ removal action. Due to these concerns, the Parties propose to realign the shared JFOS Removal Action boundary and Jorgensen Forge EAA RAB approximately 8 feet upriver to be coincident with the southeastern corner of the coffer dam as shown on Figure 1. This slight modification will result in a 97-square-foot increase in the upland area encompassed by the JFOS Removal Action boundary and an equivalent decrease in the Jorgensen Forge EAA RAB area (Figure 1).

Boeing, EMJ, and Jorgensen Forge hereby request written confirmation from EPA that the proposed boundary modification is acceptable.

If you have any questions, please contact Gil Leon at EMJ, Miles Dyer at Jorgensen Forge, or Will Ernst at Boeing.

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Date: 2014.04.04 13:03:40 -07'00'

Will Ernst
THE BOEING COMPANY

E. Gilbert Leon Jr.
EARLE M. JORGENSEN COMPANY

4-4-2014

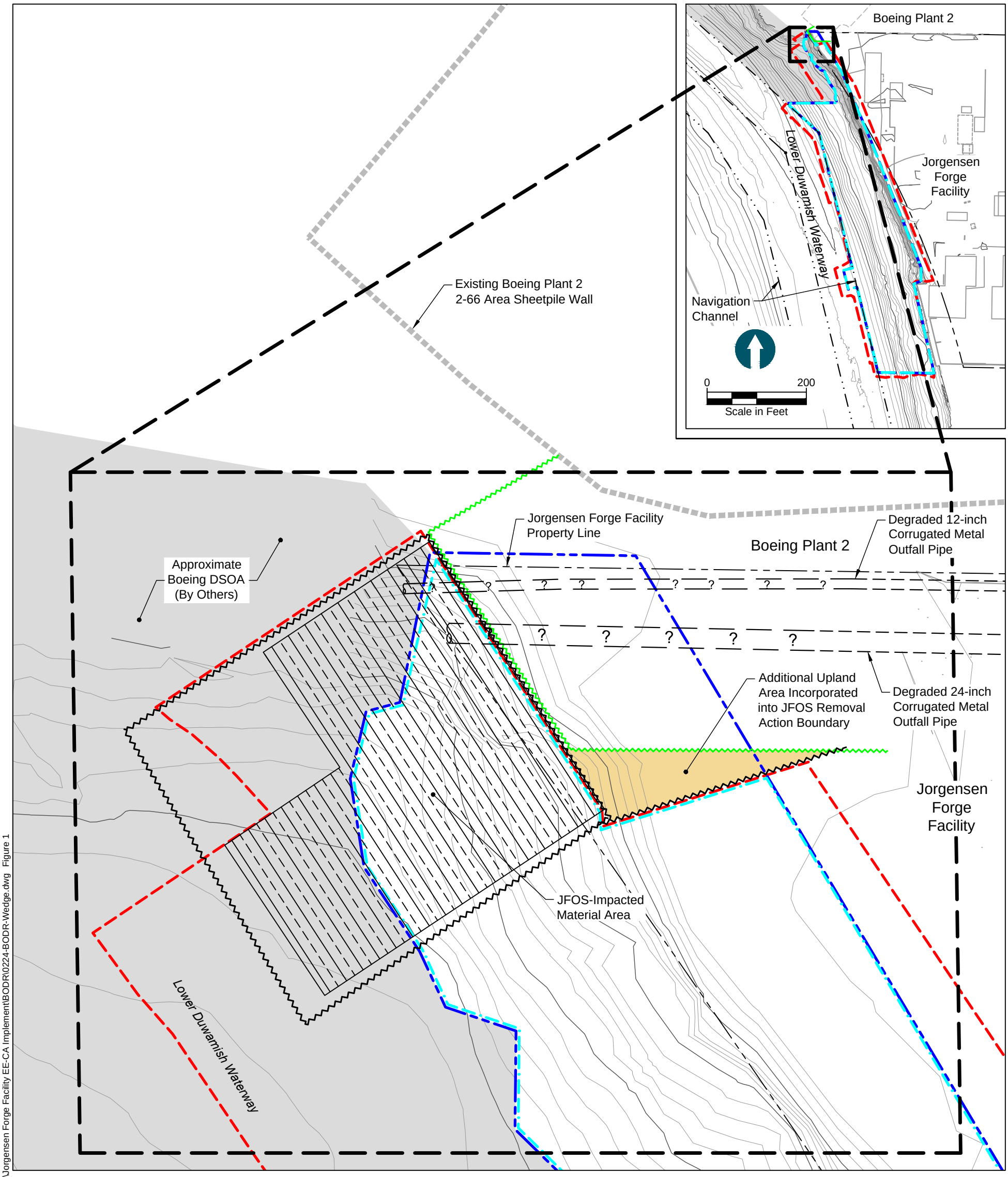
Miles Dyer
JORGENSEN FORGE CORPORATION

Attachments

Figure 1: Existing and Revised Jorgensen Forge EAA Removal Action and JFOS Removal Action Boundaries

Attachment 1: JFOS Removal Action Boundary

Attachment 2: Existing and Revised Jorgensen Forge EAA Removal Action and JFOS Removal Action Boundaries



HORIZONTAL DATUM: Washington State Plane North, NAD83.
VERTICAL DATUM: Mean Lower Low Water (MLLW).

NOTES:

1. The JFOS Removal Action containment barrier to be installed by Jorgensen Forge Corporation (Jorgensen Forge) and The Boeing Company (Boeing) under a separate EPA Administrative Order of Consent (AOC) to address releases of PCBs from the Property Line Storm Pipes.
2. The JFOS Removal Action boundary was identified in the Second Modification to the AOC (CERCLA Docket No. 10-2011-0017) between EPA, Jorgensen Forge, and Boeing.
3. The revised JFOS Removal Action containment barrier alignment is based on the alignment shown in the Jorgensen Forge design submittal to EPA on January 20, 2014 and approved by EPA on January 23, 2014.

LEGEND:

- Existing Bathymetry (1 ft interval)
- Jorgensen Forge Facility Property Line
- Approximate Boeing DSOA
- Jorgensen Forge EAA Dredge/Excavation Limits
- Removal Action Boundary (Final Engineering Evaluation/Cost Analysis, October 2011)
- JFOS Removal Action Boundary (May 2013, See Note 2)
- Revised JFOS Removal Action Boundary (January 2014, See Note 3)
- Revised Removal Action Boundary (February 2014)

JFOS = Jorgensen Forge Outfall Site
DSOA = Duwamish Sediment Other Area
EAA = Early Action Area
PCB = Polychlorinated Biphenyls

0 10
Scale in Feet

Mar 25, 2014 10:08am tgriga K:\Projects\0224-Farallon Consulting\Jorgensen Forge Facility EE-CA Implement\BODR\0224-BODR-Wedge.dwg Figure 1

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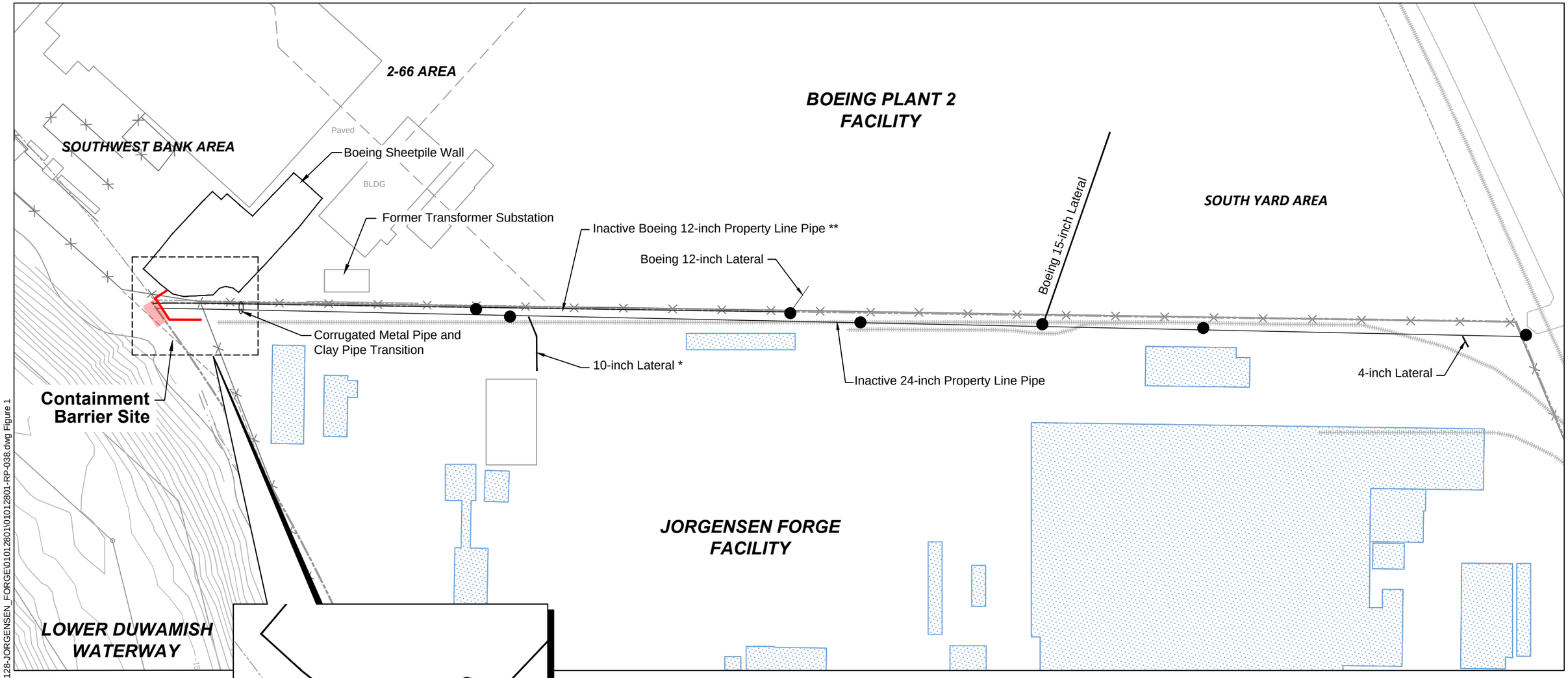
Figure 1
Existing and Revised Jorgensen Forge EAA Removal Action and JFOS Removal Action Boundaries
Jorgensen Forge Early Action Area



SOURCE: Prepared from drawing provided by Farallon Consulting dated April 15, 2008.

HORIZONTAL DATUM: Washington State Plane North, NAD83.

0 100
Scale in Feet

LEGEND:

- Manhole Location
- Property Boundary
- Railroad Spur
- Fence
- Current Facility Structures
- Potential Additional Shoreline Bank Removal Area (see notes 2 and 3)
- Containment Barrier

NOTES:

1. Buildings are not geo-referenced.
2. Geoprobe borings will be performed at depth below the shoreline bank to further evaluate soil PCB concentrations and determine if deeper removal along the bank may be required pursuant to this order and concurrent with the EMJ removal action activities.
3. The shown extents of the potential additional shoreline bank removal area reflects the maximum implementable removal area, which is defined by removal to -5 feet MLLW, and bounded by the containment barrier corners, and extended laterally to the intersection with the EMJ removal action target dredge elevation.
4. This figure was included in the Second Modification to the Administrative Order on Consent for Removal Action (AOC) (CERCLA Docket No. 10-2011-0017).

* Formerly referred to as '12-Inch Lateral'
** Formerly referred to as 'Boeing 15-Inch Property Line Pipe'

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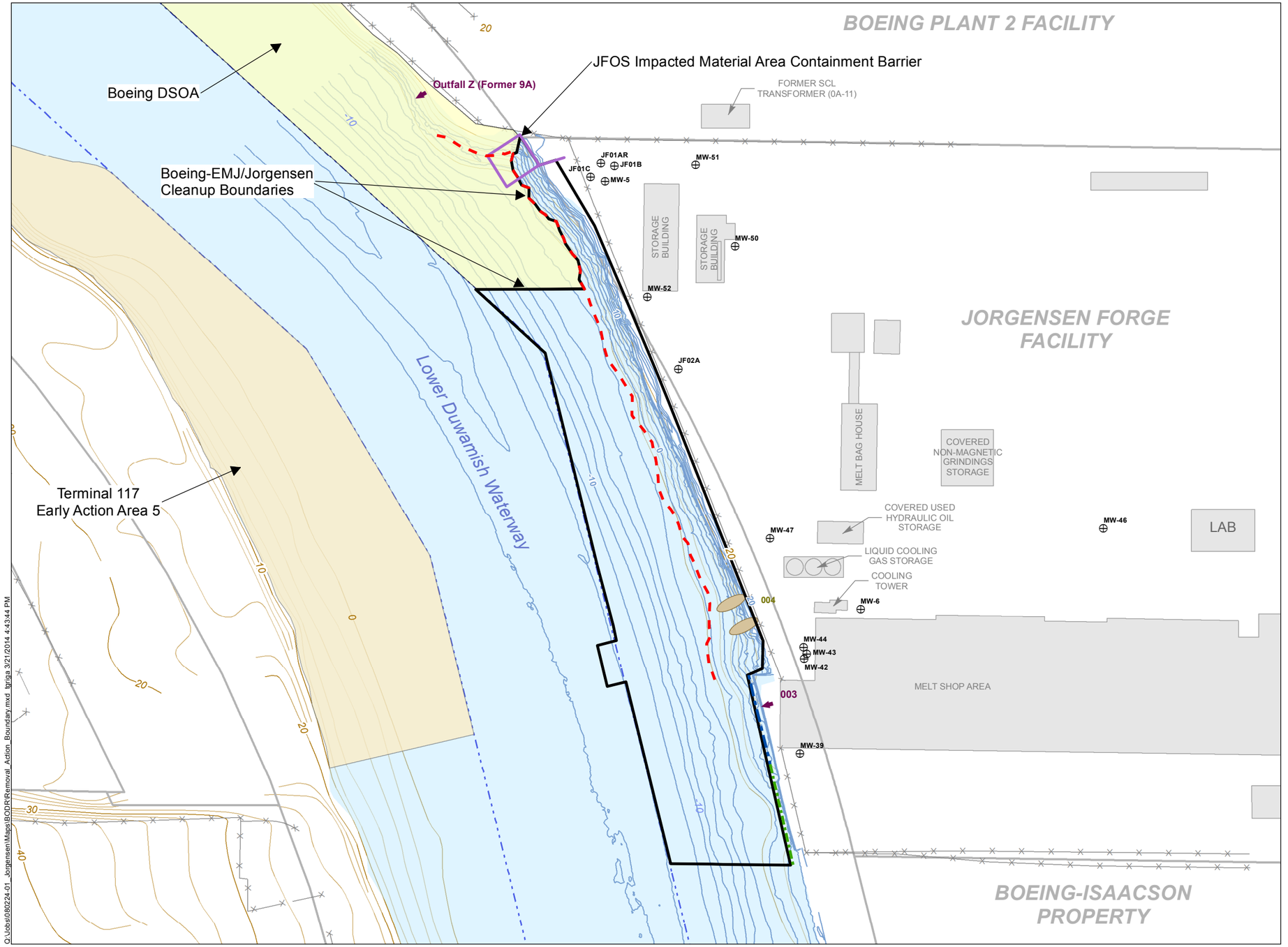
Figure 1
Containment Barrier Site Area
Second Modification to Administrative Order on Consent
Jorgensen Forge Outfall Site



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LEGEND

- Groundwater Monitoring Well
- Active Outfall
- Toe of Existing Riprap
- Existing Sheetpile Wall
- Existing Concrete Panel Wall
- Fences
- Federal Navigation Channel
- Removal Action Boundary
- Debris Pile
- Property Boundaries
- Boeing DSOA
- Terminal 117 Early Action Area 5 Boundary
- JFOS-Impacted Material Area Containment Barrier

NOTES:

1. Bathymetric survey by eTrac dated February 8, 2012. Additional back survey by AEC Consultants, Inc. dated February 21, 2012. Bathymetric and bank survey merged with upland survey by PLS, Inc. dated January 24, 2012.

2. Outfall locations field identified on May 14, 2003.

3. The toe of riprap slope was surveyed during a low tide on August 28, 2008.

4. The Boeing-EMJ/Jorgensen cleanup boundaries are identified in the Memorandum of Understanding between Boeing and EMJ/Jorgensen Forge, dated August 2007 (EMJ et al. 2007).

5. The shown JFOS-Impacted Material Area containment barrier alignment is based on the alignment shown in the Jorgensen Forge design submittal to EPA on January 20, 2014.

Feet

0 50 100 150 200

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Figure 4
Removal Action Boundary
Basis of Design Report
Jorgensen Forge Early Action Area